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and JONATHAN BALZORA

* E-filed on 10/11/06 *

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iSMART INTERNATIONAL LIMITED and

Counterdefendant RAJ DHESIKAN

11 ||

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15 Attorneys for Defendants and Counterclaimants
LEBESGUE, LLC, PLATESGUE, SEGUIN

15 I-DOCSECURE, LLC; E-NETSECURE SERVICES, INC.,
ISMAIR SECURE LLC; JOSPEH PAGGIO

ISMART SECURE LLC and JOSEPH BAGGIO

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

19 ISMART INTERNATIONAL LIMITED

20 Plaintiff,

21 || VS.

22 I-DOCSECURE, LLC, a California limited liability
23 company; E-NETSECURE SERVICES, INC., a
24 California corporation; INTEGRITY DATA
25 APPLICATIONS CONSULTING, LLC, a
California limited liability company; ISMART
SECURE LLC, a Delaware limited liability
company; JOSEPH BAGGIO, an individual;
JONATHAN BALZORA, an individual.

Defendants.

AND RELATED COUNTER CLAIM.

CASE NO. C 04-03114 RMW

**STIPULATION AND [PROPOSED]
ORDER OF DISMISSAL WITH
PREJUDICE OF
COUNTERDEFENDANT RAJ
DHESIKAN AND DEFENDANTS
JONATHAN BALZORA AND
INTEGRITY DATA APPLICATIONS
CONSULTING, LLC**

STIPULATION

Pursuant to Federal Rule of Civil Procedure 41(a), the parties in this action stipulate as follows:

4 1. PLAINTIFF ISMART INTERNATIONAL LIMITED (“PLAINTIFF” or “ISMART”)
5 through its attorneys of record hereby stipulates to dismiss with prejudice the First Amended
6 Complaint in its entirety solely as to DEFENDANTS INTEGRITY DATA APPLICATIONS
7 CONSULTING, LLC (“INTEGRITY”) and JONATHAN BALZORA (“BALZORA”).

8 2. PLAINTIFF through its attorneys of record also agrees to stipulate to waive all rights
9 to pursue costs and attorneys' fees against INTEGRITY and BALZORA.

10 3. COUNTERCLAIMANTS I-DOCSECURE, LLC; E-NETSECURE SERVICES,
11 INC.; ISMART SECURE, LLC; AND JOSEPH BAGGIO (“COUNTERCLAIMANTS”) through
12 their attorneys of record hereby stipulate to dismiss with prejudice their Counterclaims in their
13 entirety against COUNTERDEFENDANT RAJ DHESIKAN (“DHESIKAN”).

14 4. COUNTERCLAIMANTS through their attorneys of record also stipulate to waive all
15 rights to pursue costs and attorneys' fees against DHESIKAN.

16 5. INTEGRITY and BALZORA, through their attorneys of record stipulate to waive all
17 rights to pursue costs and attorneys' fees against PLAINTIFF.

18 6. DHESIKAN, thorough his attorneys of record stipulate to waive all rights to pursue
19 costs and attorneys' fees against COUNTERCLAIMANTS.

20 | SO STIPULATED.

DATED: October 4, 2006

SULLWOLD & HUGHES

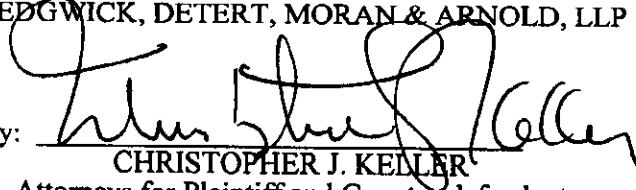
By

JAMES A. HUGHES

Attorneys for Defendants INTEGRITY DATA
APPLICATIONS CONSULTING, LLC and
JONATHAN BALZORA

1 DATED: October 4, 2006

SEDGWICK, DETERT, MORAN & ARNOLD, LLP

2 By: 

3 CHRISTOPHER J. KELLER

4 Attorneys for Plaintiff and Counter-defendant

5 ISMART INTERNATIONAL LIMITED and

6 Counter-defendant RAJ DHESIKAN

7 DATED: October ___, 2006

PAUL, HASTING, JANOFSKY & WALKER, LLP

8 By: _____

9 MICHAEL EDELMAN

10 Defendants and Counterclaimants I-DOCSECURE,

11 LLC, E-NETSECURE SERVICES, INC.,

12 ISMART SECURE LLC and JOSEPH BAGGIO

13 **ORDER**

14 The Court hereby dismisses with prejudice the First Amended Complaint in this matter as to
15 Defendants Integrity Data Applications Consulting, Inc. and Jonathan Balzora. The Court hereby
16 dismisses with prejudice the Counterclaims in this matter against Counterdefendant Raj Dhesikan.
17 No party shall be entitled to pursue costs or attorneys' fees against Defendants Integrity Data
18 Applications Consulting, LLC or Jonathan Balzora or Counterdefendant Raj Dhesikan, Balzora and
19 Integrity shall not be entitled to pursue costs or attorneys' fees against Plaintiff and Dhesikan shall
20 not be entitled to pursue costs or attorneys' fees against Counterclaimants.

21
22 **IT IS SO ORDERED.**

23
24 DATED: _____

25 Hon. Ronald M. Whyte
26 UNITED STATES DISTRICT JUDGE

1 DATED: October 4, 2006

SEDGWICK, DETERT, MORAN & ARNOLD, LLP

2
3
4 By: _____ CHRISTOPHER J. KELLER
5 Attorneys for Plaintiff and Counter-defendant
6 ISMART INTERNATIONAL LIMITED and
Counter-defendant RAJ DHESIKAN

7 DATED: October 5, 2006

PAUL, HASTING, JANOFSKY & WALKER, LLP

8
9 By: 
10 MICHAEL EDELMAN
11 Defendants and Counterclaimants I-DOCSECURE,
LLC, E-NETSECURE SERVICES, INC.,
ISMART SECURE LLC and JOSEPH BAGGIO

12
13 **ORDER**

14 The Court hereby dismisses with prejudice the First Amended Complaint in this matter as to
15 Defendants Integrity Data Applications Consulting, Inc. and Jonathan Balzora. The Court hereby
16 dismisses with prejudice the Counterclaims in this matter against Counterdefendant Raj Dhesikan.
17 No party shall be entitled to pursue costs or attorneys' fees against Defendants Integrity Data
18 Applications Consulting, LLC or Jonathan Balzora or Counterdefendant Raj Dhesikan, Balzora and
19 Integrity shall not be entitled to pursue costs or attorneys' fees against Plaintiff and Dhesikan shall
20 not be entitled to pursue costs or attorneys' fees against Counterclaimants.

21
22 **IT IS SO ORDERED.**

23
24 DATED: 10/11/06

Ronald M. Whyte

25 Hon. Ronald M. Whyte
26 UNITED STATES DISTRICT JUDGE